

DRAFT

EVALUATION REPORT

**Arco Facility #0743
1799 El Camino Real,
San Bruno, CA 94066
GDF#10666
Application #12539**

BACKGROUND

Kenneth R. Barton, III of Fiedler Group, on behalf of Arco Facility #0743, submitted this application to increase the throughput limit at G #10666. No hardware modification has been proposed at this time. This station is currently permitted at 1.79 million gallons per year (condition #15158)

A risk screen performed for this application indicates that an increase of 10.0 million-gallons per year throughput is acceptable under the District's Risk Management Policy. Accordingly, this station will now be conditioned to 11.79 million gallons per year pursuant to condition #22309.

This station is within 1,000 feet of Capuchino High School triggering the Public Notice requirements of the Waters Bill. There are no other schools within ¼ mile of this station.

Before the throughput increase can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above school and people living within 1,000 feet of the station. The cost of preparing and distributing this notice will be borne by the applicant.

EMISSION CALCULATIONS

Emission factors are taken from the Gasoline Service Station Industrywide Risk Assessment Guidelines developed by the California Air Pollution Officers Association's (CAPCOA) Toxics Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput increase of 10.0 million gal per year is based on the results of the Air Toxics Risk Screening.

$$\begin{aligned}\text{Total emissions:} \quad (10.0 \text{ million gal/yr})(1.27 \text{ lb/1000 gal}) &= 12,700 \text{ lb/yr} \\ &= 34.79 \text{ lb/day} \\ &= 6.35 \text{ TPY}\end{aligned}$$

$$\begin{aligned}\text{Benzene emission increase:} \quad &(\text{emission rate, } 9.73\text{E-}5 \text{ g/sec per million gallons}) \\ &* (86400 \text{ sec/day}) \\ &* (365 \text{ days/year}) \\ &* (0.0022 \text{ lb/g}) \\ &* (10.0 \text{ million gallons increase}) \\ &= 67.51 \text{ lb/year}\end{aligned}$$

NEW SOURCE REVIEW

This station will emit more than 10# of VOC in a single day. Thus the BACT requirement of Regulation 2-2-301 is triggered.

BACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

Emissions from this station will remain less than 15 tpy. Per Regulation 2-2-302, offsets are not required.

TBACT

The increased risk from this project exceeds 1 per million, triggering the use of TBACT equipment. TBACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

COMPLIANCE

The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-102E and G-70-36AD, and G-70-52AM.

A. Permits – General Requirements, Regulation 2, Rule 1

The facility is located within 1000 feet of the outer boundary of Capuchino High School. It is therefore subject to the public notification requirements of Regulation 2-1-412. A public notice will be sent to all parents of students of the above-mentioned school and all residents within 1000 feet of the facility. There will be a 30-day public comment period.

B. Permits – New Source Review, Regulation 2, Rule 2

1. **Best Available Control Technology (BACT), Regulation 2-2-301:** BACT is triggered because the facility will emit more than 10 lbs of VOC per single day.
2. **Offsets, Regulation 2-2-302:** Because the total facility emissions will be less than 15 tons per year, the facility is not required to provide offsets.
3. **California Environmental Quality ACT (CEQA), Regulation 2-1-311:** This project is considered to be ministerial under Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 2.3. and therefore is not discretionary as defined by CEQA.

C. Fees – Regulation 3

All applicable fees have been paid.

RECOMMENDATION

I recommend that an Authority to Construct be issued to Arco Facility #0743, located at 1799 El Camino Real, San Bruno, CA 94066

By: _____

Flora Chan

AQ Permit Technician

Date: _____